

ADAM LEITMAN BAILEY, P.C.

*One Battery Park Plaza, 18th Flr
New York, New York 10004
212-825-0365*

Invoice Date: March 1, 2017
Invoice No. 42617
Account No. 1879.002
Page: 1

Judicial Title Insurance Agency, LLC
Attn: Richard Giliotti, President
800 Westchester Avenue, Suite S 340
Rye Brook, NY 10573

RE: Adv. Jeniece & Adam Ilkowitz

For Professional Services

| | | | Rate | Hours | |
|------------|-----|--|--------|-------|--------|
| 02/23/2017 | DR | Strategized with SJP regarding approach to litigation. | | | N/C |
| | DR | Reviewed Complaint, the Judge's part rules and title documents. | | | N/C |
| | DR | Prepared Stipulation to adjourn deadline to respond to complaint. Emails with opposing counsel. | | | N/C |
| | DR | Researched case law in preparation of drafting letter to opposing counsel and for motion to dismiss. Began preparing first draft of letter to opposing counsel. | | | N/C |
| 02/24/2017 | DR | Additional research on Rule 11 motions for sanctions. | | | N/C |
| | DR | Additional research on Rule 12 Motions to Dismiss. | | | N/C |
| | DR | Strategizing with SJP with regard to the case law. | | | N/C |
| | DR | Completed first raft of letter to Plaintiff's counsel. | | | N/C |
| | DR | Researched and reviewed Defendants Durand's Cross-claims. | | | N/C |
| | DR | Telephone call with Counsel for Defendants Durands regarding extension of time. | | | N/C |
| | DR | Emails with Counsel for Defendants Durands and prepared stipulation of adjournment. | | | N/C |
| | SJP | Review Judge Gardephe's individual practice rules and Notice of Pretrial Conference. | | | N/C |
| | SJP | Meeting with DR regarding consideration of Rule 11 sanctions motion, Rule 12 dismissal motion, pre-motion letters to plaintiff's counsel and the Court, and review of applicable court procedures. | | | N/C |
| | SJP | Review Plaintiffs' Complaint and all documents currently on Southern District case docket including the Durand defendants' cross-claims against Judicial Title. | | | N/C |
| | SJP | E-mail assignment to DR to look into answering obligations with respect to the Durand cross-claims. | | | N/C |
| | SJP | Revise proposed stipulation to extend time to answer or move to dismiss. | | | N/C |
| | SJP | Complete preparation, electronic filing and service of Notice of Appearance, Rule 7.1 Corporate Disclosure Statement, and stipulations to extend time to answer complaint and cross-claims. | 450.00 | 1.50 | 675.00 |

Judicial Title Insurance Agency, LLC
 Account No. 1879.002
 RE: Adv. Jeniece & Adam Ilkowitz

Invoice Date: 03/01/2017
 Invoice No. 42617
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| | Rate | Hours | |
|-------------------------------|------|-------|--------|
| For Current Services Rendered | | 1.50 | 675.00 |
| Total Non-billable Hours | | 13.80 | |
| Total Current Work | | | 675.00 |

Payments

| | | |
|------------|----------------|--------------------|
| 03/08/2017 | Payment | -10,000.00 |
| | Credit Balance | <u>-\$9,325.00</u> |

ADAM LEITMAN BAILEY, P.C.

*One Battery Park Plaza, 18th Flr
New York, New York 10004
212-825-0365*

Invoice Date: May 1, 2017
Invoice No. 43463
Account No. 1879.002
Page: 1

Judicial Title Insurance Agency, LLC
Attn: Richard Giliotti, President
800 Westchester Avenue, Suite S 340
Rye Brook, NY 10573

RE: Adv. Jeniece & Adam Ilkowitz

For Professional Services

| | | | Rate | Hours | |
|------------|-----|---|--------|-------|----------|
| 03/01/2017 | SJP | Review of plaintiffs' complaint together with statutory and case law authority for private right of action for violation of lead-based paint disclosure violation. | 450.00 | 0.80 | 360.00 |
| | SJP | Review applicable Federal Rules and Judge Gardephe's rules; prepare schedule of discovery deadlines and calendar of conferences. | 450.00 | 1.40 | 630.00 |
| 03/06/2017 | SJP | Prepare e-mail memo to DR regarding contents of title policy, case law that prohibits further claims arising from title search, and instructions for improving draft of legal letter to plaintiffs' counsel. | 450.00 | 0.30 | 135.00 |
| 03/07/2017 | SJP | E-mail to R. Gillotti requesting copy of complete title policy issued to Plaintiffs. | 450.00 | 0.20 | 90.00 |
| | SJP | Analyze title certificate together with Appellate Division case law regarding scope of claims that can and cannot be asserted against title insurer for breach of contract and/or negligence under the Policy or upon the title search. | 450.00 | 0.70 | 315.00 |
| 03/08/2017 | SJP | Reply e-mail to V. Morano of Judicial Title regarding clarification as to specific title policy terms and conditions given to Plaintiffs. | 450.00 | 0.10 | 45.00 |
| 03/09/2017 | SJP | Preparation of legal correspondence to plaintiffs' counsel demonstrating lack of merit to the Complaint, demanding withdrawal of Complaint as against Judicial Title, and threatening sanctions. | 450.00 | 2.00 | 900.00 |
| | SJP | Review plaintiffs' title report and title policy with attention to specific conditions that would preclude plaintiffs' negligence claim based on allegedly incomplete title search. | 450.00 | 1.50 | 675.00 |
| | SJP | Review and analyze New York State and Federal case law regarding merger of contractual and negligence claims based on bad title search into the title policy in preparation for drafting of legal letter and anticipated motion to dismiss and for sanctions. | 450.00 | 4.80 | 2,160.00 |

Judicial Title Insurance Agency, LLC
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Invoice Date: 05/01/2017
 Invoice No. 43463
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| | | | Rate | Hours | |
|------------|-----|---|--------|-------|----------|
| | SJP | Meet with DR to review case law on ability to sue for negligence based on bad title search and to outline legal letter to plaintiffs' counsel. | 450.00 | 0.50 | 225.00 |
| 03/10/2017 | SJP | Continue drafting legal letter to plaintiffs' counsel demonstrating lack of merit to claim and grounds for sanctions and demanding withdrawal of claim against Judicial Title. | 450.00 | 1.50 | 675.00 |
| 03/13/2017 | DR | Finalized letter to opposing counsel and emailed to all parties. | 350.00 | 0.30 | 105.00 |
| | ALB | Meeting with SJP and DR to revise sanctions warning letter to plaintiffs' counsel. | 525.00 | 0.30 | 157.50 |
| | SJP | Meeting with ALB and DR to revise sanctions warning letter to plaintiffs' counsel. | 450.00 | 0.30 | 135.00 |
| | SJP | Review all available New York case law concerning lead-based paint claims to confirm proposition that no title insurer has been held liable for negligence. | 450.00 | 0.50 | 225.00 |
| | SJP | Review and make final edits to advanced draft of ALB sanctions warning letter to plaintiffs' counsel. | 450.00 | 0.40 | 180.00 |
| 03/15/2017 | SJP | Review e-mail from plaintiffs' counsel Jean-Claude Mazzola regarding request for mediation and forward to ALB with negative comments on entering into mediation. | 450.00 | 0.20 | 90.00 |
| 03/16/2017 | ALB | Conference call with plaintiffs' counsel Jean-Claude Mazzola, SJP, and DR to explain why plaintiffs cannot succeed on claim against Judicial Title and why counsel should be sanctioned. | 525.00 | 0.30 | 157.50 |
| | SJP | Conference call with plaintiffs' counsel Jean-Claude Mazzola, ALB, and DR to explain why plaintiffs cannot succeed on claim against Judicial Title and why counsel should be sanctioned. | 450.00 | 0.30 | 135.00 |
| | ALB | Meeting with SJP and DR regarding what plaintiffs' counsel does not understand about title insurance and why counsel should be sanctioned. | 525.00 | 0.20 | 105.00 |
| | SJP | Meeting with ALB and DR regarding what plaintiffs' counsel does not understand about title insurance and why counsel should be sanctioned. | 450.00 | 0.20 | 90.00 |
| | SJP | Meet with WJG and with DR (0.3) to review allegations of complaint against title report and title policy and to strategize about grounds for dismissal pursuant to Federal Rule 12 and sanctions pursuant to Federal Rule 11. | 450.00 | 0.90 | 405.00 |
| 03/21/2017 | DR | Prepared first draft of pre-motion letters. | 350.00 | 0.90 | 315.00 |
| 03/28/2017 | DR | Strategize with SJP regarding additions and exhibits to the pre-motion letter. | 350.00 | 0.20 | 70.00 |
| | DR | Prepared second draft of pre-motion letters | 350.00 | 3.10 | 1,085.00 |
| | SJP | Confer with DR regarding drafting and revision of pre-motion letters to Judge Gardephe for dismissal/summary judgment and sanctions. | 450.00 | 0.50 | 225.00 |
| 03/30/2017 | SJP | Extensive redrafting and revision of pre-motion conference request letters to Judge Gardephe with respect to proposed dismissal and sanctions motions (9.6) and related electronic filing and service | | | |

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| | | | Rate | Hours | |
|------------|-----|--|--------|-------|----------|
| | | (0.3). | 450.00 | 9.90 | 4,455.00 |
| 03/31/2017 | DR | Reviewed final draft of pre-motion letter for sanctions. | 350.00 | 0.20 | 70.00 |
| | DI | Preparation of service copies of letters to Judge Gardephe in SDNY. Arranged for hand delivery of same. | 125.00 | 0.60 | 75.00 |
| | SJP | Prepare status report to ALB regarding letters submitted to court seeking pre-motion conferences with respect to dismissal and sanctions and advising on plaintiffs' settlement demand and damages computation. | 450.00 | 0.40 | 180.00 |
| | SJP | Conduct electronic filing and service of second pre-motion letter to Judge Gardephe seeking sanctions (0.1) and coordinate with paralegal DI regarding delivery of courtesy copies to Chambers (0.1). | 450.00 | 0.20 | 90.00 |
| 04/05/2017 | DR | Reviewed opposing counsel's response letter and key cited and reviewed his case law. | 350.00 | 1.20 | 420.00 |
| | SJP | Review Plaintiffs' letter opposing request for a pre-motion conference and disputing basis for dismissal and sanctions motions, and prepare report on same to ALB. | 450.00 | 0.30 | 135.00 |
| | SJP | Reply e-mail to all counsel regarding no basis for claim against Judicial Title and non-attendance at settlement conference. | 450.00 | 0.10 | 45.00 |
| 04/06/2017 | SJP | Review and analyze case law cited in plaintiffs' pre-motion conference letter and internal case citations regarding potential liability of title insurer and/or abstractor for negligence. | 450.00 | 1.40 | 630.00 |
| 04/07/2017 | SJP | E-mail to DR regarding status of Durands' cross-claims against ENCO home inspector and against Judicial Title. | 450.00 | 0.10 | 45.00 |
| 04/10/2017 | SJP | E-mail to DR reporting on judge's order dismissing Durand cross-claim against ENCO home inspector and suggesting that a call to Durands' attorney may result in obtaining a stipulated dismissal for cross-claim against Judicial Title. | 450.00 | 0.20 | 90.00 |
| 04/18/2017 | SJP | E-mail to DR returning countersigned copy of stipulation with counsel for the Durand defendants. | 450.00 | 0.10 | 45.00 |
| | SJP | E-mail to the Orders and Judgments Clerk of the Southern District of New York submitting stipulation with Durand defendants for signature by Judge Gardephe. | 450.00 | 0.20 | 90.00 |
| | SJP | Review pre-motion conference correspondence from defendants Pilla, Judicial Title, and ENCO Home Inspection, and responsive letters from Plaintiffs' counsel. | 450.00 | 0.60 | 270.00 |
| | SJP | Meet with DR regarding status of pre-motion letters and defensive planning in case Durand defendants achieve settlement and seek a bar order. | 450.00 | 0.30 | 135.00 |
| 04/19/2017 | SJP | Review letter from Plaintiffs' counsel in opposition to ENCO Home Inspector's pre-motion letter. | 450.00 | 0.20 | 90.00 |
| 04/21/2017 | SJP | Review answer by defendant Houlihan Lawrence and real estate agent asserting cross-claim against Judicial Title (0,2), evaluate defenses to cross-claim (0.2), and compute answering deadline to | | | |

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| | | | Rate | Hours | |
|------------|-----|--|--------|-------|----------|
| | | cross-claim (0.1). | 450.00 | 0.50 | 225.00 |
| 04/22/2017 | SJP | E-mail to DR regarding cross-claim against Judicial Title title asserted by real estate broker/agent defendants Houlihan Lawrence and Jane Carmody. | 450.00 | 0.10 | 45.00 |
| 04/24/2017 | SJP | Prepare revised draft, finalize, and electronically serve and file pre-motion conference letter addressing cross-claim asserted by real estate agent Houlihan Lawrence. | 450.00 | 1.50 | 675.00 |
| 04/25/2017 | SJP | Prepare e-mail to counsel for all parties regarding failure thus far of counsel for Plaintiffs and for Durand defendants to prepare drafts of joint letter and conference order submissions to Judge Gardephe and reporting on Judicial Title's intention to proceed with motions for dismissal or summary judgment and sanctions. | 450.00 | 0.60 | 270.00 |
| | SJP | E-mail updates to DR regarding (1) filing of pre-motion letter on Houlihan Lawrence cross-claim; and (2) order of Judge Gardephe signing off on stipulation to dismiss Durand contractual cross-claim against Judicial Title. | 450.00 | 0.20 | 90.00 |
| | SJP | Conference with WJG regarding status of proceedings in advance of pre-trial conference. | 450.00 | 0.30 | 135.00 |
| | SJP | Phone call with counsel for Durand defendants R. Leff regarding responsibility for drafting proposed joint party submissions to court and litigation exposure of the various defendants. | 450.00 | 0.10 | 45.00 |
| | SJP | Review pre-motion conference request letter from counsel to defendant Pilla concerning proposed motion to dismiss cross-claims asserted by Houlihan Lawrence and Carmody. | 450.00 | 0.10 | 45.00 |
| 04/26/2017 | DR | Reviewed proposed joint letter to Court. | 350.00 | 0.20 | 70.00 |
| | SJP | E-mail to DR and CEK regarding proposed content for joint letter submission to be reviewed. | 450.00 | 0.10 | 45.00 |
| | SJP | Reply e-mail to counsel for co-defendants Houlihan Lawrence and Carmody regarding potential dismissal of cross-claim. | 450.00 | 0.10 | 45.00 |
| | SJP | Review submission from attorney for defendant Pilla for inclusion in joint letter to Court. | 450.00 | 0.10 | 45.00 |
| | SJP | Revise and tighten text of proposed joint letter to Court setting forth the factual and legal background to Judicial Title's defenses in the action and circulate to counsel for all parties to be finalized and delivered to Court. | 450.00 | 0.70 | 315.00 |
| | SJP | Prepare letter submission to Judge Gardephe setting forth description of the factual and legal bases for Judicial Title's defenses and anticipated motions as required by Pretrial Conference Order. | 450.00 | 3.80 | 1,710.00 |
| | SJP | Review and note comments to proposed case management plan and scheduling order circulated by plaintiffs' counsel. | 450.00 | 0.20 | 90.00 |
| | SJP | Finalize Judicial Title submission to joint parties' letter to court to reflect DR comments. | 450.00 | 0.10 | 45.00 |
| | SJP | Reply e-mail to all counsel submitting Judicial Title's submission for inclusion in joint parties' letter to Court and comments on proposed case management plan. | 450.00 | 0.10 | 45.00 |
| | SJP | Review letter from counsel for ENCO Home Inspector regarding pre-motion conference request in relation to Houlihan cross-claim. | 450.00 | 0.10 | 45.00 |

Judicial Title Insurance Agency, LLC
 Account No. 1879.002
 RE: Adv. Jeniece & Adam Ilkowitz

Invoice Date: 05/01/2017
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| | | | Rate | Hours | |
|------------|-----|--|--------|-------|------------|
| 04/27/2017 | SJP | Conduct final review of proposed joint counsel letter to Judge Gardephe and proposed Case Management Order together with related e-mail correspondence among counsel prior to submission to court. | 450.00 | 0.50 | 225.00 |
| | SJP | Compile and organize pleadings, pre-motion letters and responses, and other critical documents for CEK to prepare for Initial Pre-Trial Conference scheduled on 5-4-2017. | 450.00 | 1.50 | 675.00 |
| 04/28/2017 | DR | Researched on whether there is a distinction based upon lead paint being found on the outside or inside of the premises. | 350.00 | 2.10 | 735.00 |
| | SJP | Review e-mail report from DR regarding courts' treatment of lead inside house versus outside house for purposes of determining whether the federal disclosure statute has been triggered. | 450.00 | 0.10 | 45.00 |
| | SJP | Phone call with law clerk to Judge Gardephe regarding any possibility of willingness to participate in a settlement conference with a magistrate judge. | 450.00 | 0.10 | 45.00 |
| | | DISCOUNT | | | -11,132.50 |
| | | For Current Services Rendered | | 51.60 | 11,132.50 |

Expenses

| | | |
|------------|---|--------|
| 03/13/2017 | Postage | 7.25 |
| 03/13/2017 | Postage | 0.47 |
| 03/31/2017 | PACER - Public Access to Court Electronic Records | 14.20 |
| 04/30/2017 | Research on WestLaw | 194.19 |
| 04/30/2017 | PACER - Public Access to Court Electronic Records | 6.80 |
| | Total Expenses | 222.91 |

Disbursements

| | | |
|------------|---|--------------------------|
| 03/31/2017 | Services rendered as per United Parcel Services | 8.53 |
| | Total Disbursements | 8.53 |
| | Total Current Work | 11,363.94 |
| | Previous Balance | -\$9,325.00 |
| | Balance Due | <u><u>\$2,038.94</u></u> |

ADAM LEITMAN BAILEY, P.C.

*One Battery Park Plaza, 18th Flr
New York, New York 10004
212-825-0365*

Invoice Date: June 1, 2017
Invoice No. 44230
Account No. 1879.002
Page: 1

Judicial Title Insurance Agency, LLC
Attn: Richard Giliotti, President
800 Westchester Avenue, Suite S 340
Rye Brook, NY 10573

RE: Adv. Jeniece & Adam Ilkowitz

For Professional Services

| | | | Rate | Hours | |
|------------|-----|--|--------|-------|----------|
| 05/01/2017 | SJP | E-mail to CEK and DR with report that Initial Pretrial Conference is indefinitely adjourned. | 450.00 | 0.10 | 45.00 |
| | SJP | E-mail to DR with report on dismissal motion scheduling order. | 450.00 | 0.10 | 45.00 |
| | SJP | Reply e-mail to DR regarding suggestion that a motion for sanctions should be served simultaneously with motion to dismiss. | 450.00 | 0.10 | 45.00 |
| | CEK | Document review in preparation for SDNY Conference before Judge Gardephe (3.5); email from SJP that conference has been adjourned sine die (.1). | 525.00 | 3.60 | 1,890.00 |
| 05/10/2017 | SJP | Prepare detailed litigation status report to ALB for provision to client. | 450.00 | 1.40 | 630.00 |
| 05/15/2017 | DR | Began preparing first draft of memo in law in support of motion for sanctions. | 350.00 | 2.50 | 875.00 |
| 05/16/2017 | DR | Continued preparing first draft of memo in law in support of sanctions. | 350.00 | 1.20 | 420.00 |
| 05/17/2017 | DR | Completed preparing first draft of memo of law in support of motion to dismiss. | 350.00 | 1.30 | 455.00 |
| | DR | Completed preparing first draft of motion for sanctions. | 350.00 | 0.90 | 315.00 |
| 05/24/2017 | SJP | E-mail to V. Morano at Judicial Title regarding preparation of declaration to support summary judgment motion. | 450.00 | 0.20 | 90.00 |
| | | For Current Services Rendered | | 11.40 | 4,810.00 |

Expenses

| | | |
|------------|---------------------|-------|
| 05/31/2017 | Research on WestLaw | 24.39 |
| | Total Expenses | 24.39 |

Judicial Title Insurance Agency, LLC
Account No. 1879.002
RE: Adv. Jeniece & Adam Ilkowitz

Invoice Date: 06/01/2017
Invoice No. 44230
Page No. 2

| | |
|--------------------|----------|
| Total Current Work | 4,834.39 |
|--------------------|----------|

| | |
|------------------|------------|
| Previous Balance | \$2,038.94 |
|------------------|------------|

| | |
|--------------------|--------------------------|
| Balance Due | <u>\$6,873.33</u> |
|--------------------|--------------------------|

ADAM LEITMAN BAILEY, P.C.

*One Battery Park Plaza, 18th Flr
New York, New York 10004
212-825-0365*

Invoice Date: July 1, 2017
Invoice No. 44943
Account No. 1879.002
Page: 1

Judicial Title Insurance Agency, LLC
Attn: Richard Giliotti, President
800 Westchester Avenue, Suite S 340
Rye Brook, NY 10573

RE: Adv. Jeniece & Adam Ilkowitz

For Professional Services

| | | | Rate | Hours | |
|------------|-----|--|--------|-------|----------|
| 06/01/2017 | DR | Strategized with SJP regarding the motion for dismissal and the motion for sanctions. | 350.00 | 0.60 | 210.00 |
| | MZ | Compiled 5 copies of the motion for dismissal or summary judgment and the memorandum of law and served via regular mail. Prepared and executed the affidavit of service. | 100.00 | 0.90 | 90.00 |
| | SJP | Preparation and service of Judicial Title's motion to dismiss the Complaint and all cross-claims or for summary judgment dismissing the claims, including specifically drafting of Notice of Motion, drafting of Statement of the Material Facts pursuant to Local Civil Rule 56.1, drafting of Appendix of Record Authority to Defendant Judicial Title's Rule 56.1 Statement, drafting of Declaration of Vincent Morano, Declaration of Scott J. Pashman, compilation and organization of documentary exhibits to motion, and substantial drafting and revision of Memorandum of Law in support of motion. | 450.00 | 13.10 | 5,895.00 |
| 06/06/2017 | SJP | Prepare written report to V. Morano at Judicial Title on status of motions to dismiss or for summary judgment by Judicial Title, Pilla, and ENCO, and proposed motion for sanctions to be made on behalf of Judicial Title by 6-13-2017. | 450.00 | 0.40 | 180.00 |
| | SJP | Review notice of motion to dismiss and supporting papers served by defendant ENCO Home Inspector LLC. | 450.00 | 0.40 | 180.00 |
| | SJP | Review defendant Pilla's motion to dismiss. | 450.00 | 0.40 | 180.00 |
| 06/08/2017 | SJP | Prepare draft of proposed stipulation with counsel for defendants Houlihan Lawrence and Carmody to discontinue their cross-claim against Judicial Title and forward to counsel J. Briem for review. | 450.00 | 0.90 | 405.00 |
| | SJP | Phone call with counsel for co-defendants Houlihan Lawrence and Carmody regarding agreement to withdraw cross-claim against Judicial Title. | 450.00 | 0.10 | 45.00 |
| 06/12/2017 | SJP | E-mail to counsel for defendants Houlihan and Carmody following | | | |

Judicial Title Insurance Agency, LLC
 Account No. 1879.002
 RE: Adv. Jeniece & Adam Ilkowitz

Invoice Date: 07/01/2017
 Invoice No. 44943
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| | | | Rate | Hours | |
|------------|-----|---|--------|-------|----------|
| | SJP | up on proposed stipulation to discontinue cross-claim. | 450.00 | 0.10 | 45.00 |
| | SJP | E-mail to Orders and Judgments Clerk of the Southern District of New York attaching stipulation with defendants Houlihan Lawrence and Carmody to discontinue cross-claim and requesting signature by Judge Gardephe and entry as a court order. | 450.00 | 0.20 | 90.00 |
| | SJP | Review, counter-sign, and return fully executed copy of stipulation with counsel for defendants Houlihan and Carmody discontinuing cross-claim. | 450.00 | 0.20 | 90.00 |
| 06/20/2017 | DR | Strategized with SJP regarding the stipulation to discontinue by defendant Carmody and the motion for sanctions. | 350.00 | 0.30 | 105.00 |
| | SJP | Prepare litigation status update report to V. Morano at Judicial Title. | 450.00 | 0.30 | 135.00 |
| | SJP | Meet with DR regarding evaluation of procedural posture and timing of motion for sanctions. | 450.00 | 0.30 | 135.00 |
| 06/27/2017 | SJP | E-mail to plaintiffs' counsel B. Lowenthal regarding prospect of voluntary discontinuance. | 450.00 | 0.10 | 45.00 |
| | SJP | E-mail litigation status report to DR. | 450.00 | 0.10 | 45.00 |
| | SJP | E-mail analysis to DR regarding distinguishing factors as between ENCO Home Inspector and Judicial Title. | 450.00 | 0.20 | 90.00 |
| | SJP | Phone call with counsel for Durands R. Leff regarding counsel's request for two-week adjournment of motion briefing schedule. | 450.00 | 0.10 | 45.00 |
| | SJP | Review So Ordered Stipulation of Discontinuance as between Plaintiffs and ENCO Home Inspector. | 450.00 | 0.10 | 45.00 |
| 06/28/2017 | SJP | Review letter from Durands' counsel R. Leff requesting two week adjournment of schedule for briefing dismissal motions. | 450.00 | 0.10 | 45.00 |
| 06/30/2017 | SJP | Prepare interim litigation status report to ALB for submission to S. Vincini at Judicial Title. | 450.00 | 0.60 | 270.00 |
| | | For Current Services Rendered | | 19.50 | 8,370.00 |

Expenses

| | | |
|------------|---------------------|---------------------------|
| 06/01/2017 | Postage | 42.50 |
| 06/30/2017 | Research on WestLaw | 11.19 |
| | Total Expenses | 53.69 |
| | Total Current Work | 8,423.69 |
| | Previous Balance | \$6,873.33 |
| | Balance Due | <u>\$15,297.02</u> |

ADAM LEITMAN BAILEY, P.C.

*One Battery Park Plaza, 18th Flr
New York, New York 10004
212-825-0365*

Invoice Date: September 1, 2017
Invoice No. 46129
Account No. 1879.002
Page: 1

Judicial Title Insurance Agency, LLC
Attn: Richard Giliotti, President
800 Westchester Avenue, Suite S 340
Rye Brook, NY 10573

RE: Adv. Jeniece & Adam Ilkowitz

For Professional Services

| | | | Rate | Hours | |
|------------|-----|---|--------|-------|----------|
| 08/01/2017 | SJP | Preparation of motion for sanctions against plaintiffs and their counsel pursuant to Federal Rule 11. | 450.00 | 2.50 | 1,125.00 |
| 08/28/2017 | SJP | Prepare draft of litigation status report to ALB for submission to client. | 450.00 | 0.50 | 225.00 |
| 08/29/2017 | SJP | Preparation of motion seeking Rule 11 sanctions against plaintiffs or counsel. | 450.00 | 0.50 | 225.00 |
| 08/30/2017 | SJP | Preparation of motion seeking sanctions pursuant to Rule 11 against plaintiff and/or plaintiffs' counsel. | 450.00 | 4.20 | 1,890.00 |
| 08/31/2017 | SJP | Preparation of motion seeking sanctions against Plaintiffs and their counsel pursuant to Rule 11. | 450.00 | 6.40 | 2,880.00 |
| | | For Current Services Rendered | | 14.10 | 6,345.00 |

Expenses

| | | |
|------------|---------------------|---------------------------|
| 08/31/2017 | Research on WestLaw | 41.34 |
| | Total Expenses | 41.34 |
| | Total Current Work | 6,386.34 |
| | Previous Balance | \$15,297.02 |
| | Balance Due | <u>\$21,683.36</u> |

ADAM LEITMAN BAILEY, P.C.

*One Battery Park Plaza, 18th Flr
New York, New York 10004
212-825-0365*

Invoice Date: January 1, 2018
Invoice No. 48479
Account No. 1879.002
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Judicial Title Insurance Agency, LLC
Attn: Richard Giliotti, President
800 Westchester Avenue, Suite S 340
Rye Brook, NY 10573

RE: Adv. Jeniece & Adam Ilkowitz

For Professional Services

| | | | Rate | Hours | |
|------------|-----|--|--------|-------|----------|
| 09/05/2017 | SJP | Preparation of motion seeking sanctions against plaintiffs and counsel under Rule 11. | 450.00 | 4.40 | 1,980.00 |
| 09/06/2017 | SJP | Preparation of motion seeking sanctions against Plaintiffs and their counsel based on violation of Federal Rule 11. | 450.00 | 4.00 | 1,800.00 |
| 09/07/2017 | SJP | Continue preparation of memorandum of law and attorney declaration in support of motion seeking to recover sanctions against Plaintiffs and counsel. | 450.00 | 3.80 | 1,710.00 |
| 09/08/2017 | SJP | Continue preparation of memorandum of law and attorney declaration in support of motion seeking Rule 11 sanctions against plaintiffs and counsel. | 450.00 | 3.40 | 1,530.00 |
| 09/11/2017 | SJP | Continue preparation of memorandum of law and attorney declaration in support of motion to sanction plaintiffs and plaintiffs' counsel pursuant to Federal Rule 11. | 450.00 | 5.90 | 2,655.00 |
| 09/12/2017 | SJP | E-mail to paralegal DI with instructions for duplication, binding, and service of motion for sanctions. | 450.00 | 0.20 | 90.00 |
| | SJP | Continue and complete preparation of notice of motion and attorney declaration in support of motion for Rule 11 sanctions against plaintiffs and plaintiffs' counsel and continue preparation of memorandum of law in support of the motion. | 450.00 | 5.40 | 2,430.00 |
| 09/13/2017 | DI | Preparation of full service copy of motion for sanctions with relevant exhibits. | 125.00 | 0.40 | 50.00 |
| | DI | Preparation of service copies of motion for sanctions with voluminous exhibits and served on all counsel by UPS Next Day Air. | 125.00 | 2.30 | 287.50 |
| | SJP | Complete preparation and service of notice of motion, declaration in support of motion with exhibits, and memorandum of law in | | | |

Judicial Title Insurance Agency, LLC
 Account No. 1879.002
 RE: Adv. Jeniece & Adam Ilkowitz

Invoice Date: 01/01/2018
 Invoice No. 48479
 Page No. 2

| | | | Rate | Hours | |
|------------|-----|---|--------|-------|----------|
| | | support of motion seeking sanctions pursuant to Federal Rule 11 against Plaintiffs and Plaintiffs' counsel for frivolous complaint. | 450.00 | 5.80 | 2,610.00 |
| 09/14/2017 | SJP | Prepare litigation status report to V. Morano at Judicial Title reporting on motion for Rule 11 sanctions and status of summary judgment motion. | 450.00 | 0.30 | 135.00 |
| 09/22/2017 | SJP | Review and revise draft of stipulation received from plaintiffs' counsel B. Lowenthal to extend briefing schedule on motion for sanctions and return partially executed stipulation with redline of revisions and edits with comments. | 450.00 | 1.00 | 450.00 |
| | SJP | Phone call with Plaintiffs' counsel B. Lowenthal to negotiate briefing schedule on Judicial Title's motion for sanctions. | 450.00 | 0.30 | 135.00 |
| 10/17/2017 | DR | Reviewed Plaintiff's opposition to rule 11 motion for sanctions. | 350.00 | 0.70 | 245.00 |
| | SJP | Conduct brief initial review of plaintiffs' opposition to Rule 11 motion for sanctions. | 450.00 | 0.20 | 90.00 |
| 10/27/2017 | SJP | Analyze plaintiffs' opposition to sanctions motion and outline reply arguments. | 450.00 | 3.20 | 1,440.00 |
| 10/29/2017 | SJP | Preparation of reply memorandum of law in further support of Judicial Title's motion for Rule 11 sanctions. | 450.00 | 0.90 | 405.00 |
| 10/30/2017 | SJP | E-mail to plaintiffs' counsel to coordinate electronic filing of Rule 11 sanctions motion moving papers, opposition papers, and reply papers. | 450.00 | 0.10 | 45.00 |
| | SJP | Conduct electronic filing and service of Notice of Motion, Declaration in Support of Motion, Exhibits in Support of Motion, Memorandum of Law in Support of Motion, and Affidavit of Service of Judicial Title's Rule 11 motion for sanctions. | 450.00 | 1.80 | 810.00 |
| | SJP | Preparation of reply memorandum of law in further support of Judicial Title's Rule 11 motion for sanctions. | 450.00 | 3.60 | 1,620.00 |
| 10/31/2017 | SJP | Complete preparation and electronic filing and service of Reply Memorandum of Law in further support of Judicial Title's Rule 11 motion for sanctions. | 450.00 | 6.70 | 3,015.00 |
| 11/01/2017 | SJP | Review court docket to confirm completeness of all electronically filed motion papers and prepare and electronically file and serve two letters to Judge Gardephe enclosing courtesy copies of sanctions motion, requesting oral argument on sanctions motion, and advising that summary judgment motion has been pending for 90 days without decision or being scheduled for argument. | 450.00 | 1.20 | 540.00 |
| | DI | Begin preparation of courtesy copies of motion for sanctions to be hand delivered to Judge Gardephe in SDNY. | 125.00 | 0.70 | 87.50 |
| | DI | Finalization of courtesy copies of motion for sanctions with accompanying exhibits, memoranda and cover letters regarding the same and coordinate with law clerk for delivery to SDNY. | 125.00 | 1.20 | 150.00 |
| 11/03/2017 | SJP | E-mail update report to V. Morano at Judicial Title regarding status of fully briefed summary judgment and sanctions motions. | 450.00 | 0.10 | 45.00 |

Judicial Title Insurance Agency, LLC
 Account No. 1879.002
 RE: Adv. Jeniece & Adam Ilkowitz

Invoice Date: 01/01/2018
 Invoice No. 48479
 Page No. 3

| | Rate | Hours | |
|-------------------------------|------|-------|-----------|
| For Current Services Rendered | | 57.60 | 24,355.00 |

Expenses

| | | |
|------------|---|-------|
| 09/30/2017 | Research on WestLaw | 30.53 |
| 09/30/2017 | PACER - Public Access to Court Electronic Records | 58.50 |
| 10/31/2017 | Research on WestLaw | 8.18 |
| | Total Expenses | 97.21 |

Disbursements

| | | |
|------------|---|-------|
| 09/13/2017 | Services rendered as per United Parcel Services (3 @ 11.88) | 35.64 |
| 09/13/2017 | Services rendered as per United Parcel Services | 11.36 |
| | Total Disbursements | 47.00 |

| | |
|--------------------|-----------|
| Total Current Work | 24,499.21 |
|--------------------|-----------|

| | |
|------------------|-------------|
| Previous Balance | \$21,683.36 |
|------------------|-------------|

| | |
|--------------------|---------------------------|
| Balance Due | <u>\$46,182.57</u> |
|--------------------|---------------------------|

ADAM LEITMAN BAILEY, P.C.

*One Battery Park Plaza, 18th Flr
New York, New York 10004
212-825-0365*

Invoice Date: March 29, 2018
Invoice No. 49249
Account No. 1879.002
Page: 1

Judicial Title Insurance Agency, LLC
Attn: Richard Giliotti, President
800 Westchester Avenue, Suite S 340
Rye Brook, NY 10573

RE: Adv. Jeniece & Adam Ilkowitz

For Professional Services

| | | | Rate | Hours | |
|------------|-----|--|--------|-------|---------------------------|
| 03/28/2018 | DR | Reviewed Judge Gardephe's decision granting relief in our favor and to determine next steps necessary to collect on portion of judgment for sanctions. | 350.00 | 0.80 | 280.00 |
| | SJP | Review Memorandum Opinion and Order by Judge Gardephe granting Judicial Title summary judgment and sanctions against plaintiff's counsel for attorneys' fees and costs since 2-1-2017. | 450.00 | 0.90 | 405.00 |
| | | For Current Services Rendered | | 1.70 | 685.00 |
| | | Total Current Work | | | 685.00 |
| | | Previous Balance | | | \$46,182.57 |
| | | Balance Due | | | <u>\$46,867.57</u> |